

EXHIBIT 1

1 UNITED STATES DISTRICT COURT

2 CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

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4
5 MARK SNOOKAL, an individual,)

6 Plaintiff,)

7 v.)

NO. 2:23-cv-6302-

HDV-AJR

8 CHEVRON USA, INC., a California)
9 Corporation, and DOES 1 through)
10 10, inclusive,)

Defendants.)
_____)

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17 Videotaped deposition of MARK JORDAN

18 SNOOKAL, Plaintiff, taken on behalf of Defendants
19 at 333 South Hope Street, 43rd Floor, Los Angeles,
20 California, commencing at 10:00 a.m. on Friday,
21 May 10, 2024, before John M. Taxter, Certified
22 Shorthand Reporter No. 3579 in and for the State
23 of California, a Registered Professional Reporter.
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21 VIDEOGRAPHER:

22 GIGI FADICH
23
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1 cardiologist. They just managed it through my 10:50:55
2 primary-care physician. I recently changed 10:50:58
3 employment to a different employer, and I do have 10:51:02
4 a cardiologist now, a Dr. Schneider. I've only 10:51:05
5 seen him once. 10:51:10

6 Q Okay. And we'll get into this more 10:51:11
7 later, but I believe you moved to Washington? 10:51:13

8 A Correct. 10:51:14

9 Q And so Dr. Schneider is in Washington? 10:51:15

10 A He's actually in Portland. I live right 10:51:17
11 near Portland, Oregon. 10:51:21

12 Q Oh, I see. 10:51:21

13 A There's a heart center in Portland, 10:51:22
14 Oregon. 10:51:26

15 Q And when was your most recent checkup 10:51:26
16 with Dr. Schneider? 10:51:28

17 A It was actually unrelated to the aortic 10:51:31
18 root dilation and was in -- I don't remember the 10:51:36
19 exact month, but it was late 2023. 10:51:43

20 Q And what was it related to? 10:51:46

21 A Tangentially related to PVCs that I also 10:51:50
22 listed on the form. They ablated those to end -- 10:51:56
23 end me having PVCs. 10:51:59

24 Q What are PVCs? 10:52:01

25 A Premature ventricular contractions. 10:52:03

1 Q So that's a separate heart issue from 10:52:07
2 the dilated aortic -- dilated aortic root? 10:52:10
3 A Not necessarily. The dilated aortic 10:52:11
4 root expands the root portion of the heart and can 10:52:15
5 cause other heart conditions that are related to 10:52:18
6 it but not necessarily caused by it. 10:52:22
7 Q I see. And so one of those conditions 10:52:26
8 is PVCs? 10:52:28
9 A Correct. 10:52:31
10 Q And so you were treated for PVCs? 10:52:31
11 A I was. 10:52:34
12 Q And I think you said they -- that they 10:52:35
13 resolved the issue? 10:52:37
14 A They did. 10:52:39
15 Q But you -- the dilated aortic root can't 10:52:39
16 be treated; is that right? 10:52:42
17 A Not without open heart surgery, no. 10:52:44
18 Q I'm assuming you haven't had open heart 10:52:46
19 surgery to treat it. 10:52:50
20 A I have not. 10:52:50
21 Q So you still have the dilated aortic 10:52:51
22 root? 10:52:51
23 A I do. 10:52:54
24 Q And when was the last time you spoke to 10:52:55
25 a doctor who I'm assuming is Dr. Schneider -- 10:52:56

1	correct me if that's wrong -- about the dilated	10:52:58
2	aortic root?	10:53:01
3	A It was early in -- it was around	10:53:02
4	September of 2023 when I switched jobs.	10:53:05
5	Q And what, if anything, did he say about	10:53:10
6	the dilated aortic root?	10:53:11
7	A The same thing that Dr. Khan said,	10:53:13
8	essentially. "We'll just watch it until we have	10:53:16
9	to make a decision about its size."	10:53:20
10	Q Okay. So has it expanded at all since	10:53:22
11	the initial diagnosis?	10:53:27
12	A It has.	10:53:29
13	Q And -- but not -- not to the extent that	10:53:32
14	it would need to be treated with surgery; is that	10:53:35
15	right?	10:53:35
16	A That's correct.	10:53:38
17	Q Have any changes over the last few years	10:53:46
18	since you left Chevron impacted the risk of aortic	10:53:50
19	rupture, as far as you know, as far as what your	10:53:54
20	doctor has told you?	10:53:57
21	A Not as far as I know.	10:53:57
22	Q Aortic dissection?	10:53:58
23	A Not as far as I know.	10:54:01
24	Q Has the -- well, have -- have your heart	10:54:05
25	conditions impacted your ability to work?	10:54:08

1	A	Never.	10:54:11
2	Q	Have you seen any other doctors in	10:54:16
3		connection with your heart condition?	10:54:18
4	A	When I first came up to the Portland	10:54:22
5		area, I consulted with Kaiser, and they pushed me	10:54:25
6		around a few times until they settled on someone	10:54:30
7		to handle the case --	10:54:32
8	Q	Okay.	10:54:34
9	A	-- but no one other than that.	10:54:34
10	Q	I thought -- I thought you said it was	10:54:36
11		your general practitioner. Is that --	10:54:37
12	A	It was by the time we finally settled	10:54:39
13		out. But she tried to get me in with cardiology,	10:54:42
14		and cardiology said, "We don't need to monitor	10:54:46
15		this," so that's what I mean by I got pushed	10:54:50
16		around a little bit.	10:54:51
17	Q	I see. And I don't think I got the name	10:54:52
18		of the -- the primary-care physician you treated	10:54:53
19		with in Portland.	10:54:57
20		Do you know that?	10:54:57
21	A	Kaiser was actually in Washington.	10:54:58
22		Sorry. Sorry to be confusing. It's right there	10:55:00
23		on the border, so people do things in both states	10:55:02
24		like all the time like it's nothing.	10:55:04
25	Q	I see. So when you lived in Oregon, you	10:55:06

1 STATE OF CALIFORNIA)
) SS.
2 COUNTY OF VENTURA)

3 I, John M. Taxter, a California Certified
4 Shorthand Reporter, Certificate No. 3579, a
5 Registered Professional Reporter, do hereby
6 certify:

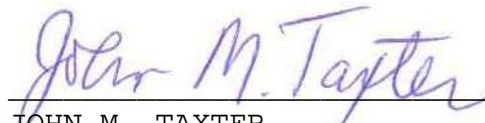
7 That the foregoing proceedings were taken
8 before me at the time and place therein set forth,
9 at which time the deponent was put under oath by
10 me; that the testimony of the deponent and all
11 objections made at the time of the examination
12 were recorded stenographically by me and were
13 thereafter transcribed; that the foregoing is a
14 true and correct transcript of my shorthand notes
15 so taken.

16 I further certify that I am neither counsel
17 for nor related to any party to said action.

18 The dismantling, unsealing, or unbinding of
19 the original transcript will render the Reporter's
20 Certificate null and void.

21 Pursuant to Federal Rule 30(e), transcript
22 review was requested.

23 Dated May 22, 2024.

24 
25 JOHN M. TAXTER
California Certified Shorthand
Reporter No. 3579, RPR

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I, John M. Taxter, Certified Shorthand Reporter,
CSR No. 3579, hereby certify:

The foregoing is a true and correct copy of the
original transcript of the proceedings taken by me
as thereon stated.

Dated: May 23, 2024



John Taxter, CSR No. 3579